

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**PLAINTIFFS' MOTION TO SEAL THEIR MOTION FOR SANCTIONS AGAINST
DEFENDANT JAMES ALEX FIELDS, JR. AND SELECTED SUPPORTING EXHIBITS**

On August 11, 2021, Plaintiffs Elizabeth Sines, Seth Wispelwey, Marisa Blair, April Muniz, Marcus Martin, Natalie Romero, Chelsea Alvarado, John Doe, and Thomas Baker ("Plaintiffs"), by and through their counsel, filed a redacted Motion for Sanctions against Defendant James Alex Fields, Jr. ("Plaintiffs' Motion"). For the reasons set forth below, Plaintiffs respectfully request that the Court enter the proposed order sealing their unredacted Motion, as well as their unredacted Appendix B and supporting Exhibits 7, 8, and 19-24, which were submitted conditionally under seal to the Court pursuant to W.D. Va. Local Rule 9.

Exhibits 7, 8, and 19-21 were designated as Confidential by the Federal Bureau of Investigation and the Department of Justice pursuant to the Agreed Privacy Protective Order, entered on September 22, 2020 (ECF No. 882, the "Privacy Protective Order"), and contain Protected Information as defined by the terms of the Privacy Protective Order. Further, Exhibits 22-24 were designated as Confidential by Plaintiffs pursuant to the Order for the Production of

Documents and Exchange of Confidential Information entered on January 3, 2018 (ECF No. 167, the “Protective Order”). For the reasons set forth herein, Plaintiffs request that their unredacted Motion and Appendix B, as well as supporting Exhibits 7, 8, and 19-24 be sealed in accordance with W.D. Va. Local Rule 9, the Privacy Protective Order, and the Protective Order.

Dated: August 11, 2021

Respectfully submitted,

/s/ David E. Mills

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CERTIFICATE OF SERVICE

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I further hereby certify that on August 11, 2021, I also served the foregoing upon following *pro se* defendants, via electronic mail, as follows:

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I further hereby certify that on August 11, 2021, I also served the foregoing upon following *pro se* defendant, via first class mail, as follows:

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